

**PARTIALLY ASSENTED-TO MOTION TO ADMIT**  
**ADRIAEN M. MORSE JR. *PRO HAC VICE***

1. The Foundation has specifically retained Attorney Morse for his understanding and expertise in the issues to be litigated and it wishes for him to be involved in all stages of these proceedings;
2. The attached supporting affidavit, *see* Local Rule 83.2(b)(1), attests that Attorney Morse is a member in good standing of the bars of Virginia, California, and the District of Columbia, and several federal district and appellate courts. Attorney Morse is not currently suspended or disbarred in any jurisdiction, and there are no previous or pending disciplinary matters against him. Attorney Morse has no prior felony or misdemeanor criminal convictions. Finally, no court has ever denied an

application by Attorney Morse for admission *pro hac vice*, nor has any court ever revoked such status.

3. Attorney Morse will at all times be associated with the undersigned, who is a member of the bar of this Court.
4. The fee for admission is being paid contemporaneously with the filing of this motion. *See* Local Rule 83.2(b)(2).
5. A good-faith attempt was made to obtain concurrence in the relief sought by this motion. *See* Local Rule 7.1(c). Counsel for plaintiff assents to the relief sought. At the time of filing, defendant LBRY, Inc. had not yet provided a position concerning this motion
6. This motion is supported entirely by the accompanying affidavit of Attorney Morse and the points made above, and therefore does not require a memorandum. *See* Local Rule 7.1(a)(2).

WHEREFORE, the Foundation respectfully requests that the Court admit Adriaen M. Morse Jr. *pro hac vice*.

July 2, 2021

Respectfully submitted,

LBRY Foundation, Inc.

By its attorneys,

/s/ Simon R. Brown

Simon R. Brown (N.H. Bar No.9279)  
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**CERTIFICATE OF SERVICE**

I hereby certify that, on July 2, 2021, I caused true and correct copies of the foregoing Assented-to Motion to Admit Adriaen M. Morse Jr. *Pro Hac Vice* together with its supporting affidavit to be served on counsel of record for all parties that have appeared to date through the Court's CM/ECF system as listed below.

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/s/ Simon R. Brown  
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Simon R. Brown